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15 *Attorneys for Movant Thuan Nguyen*

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 ROBERT RAHIMI, Individually and on
19 Behalf of All Others Similarly Situated,
20
21 Plaintiff,

22 v.

23 TESLA MOTORS, INC., ELON MUSK, and
24 DEEPAK AHUJA,
25
26 Defendants.

No. 3:13-cv-05216-CRB

Hon. Charles R. Breyer

**DECLARATION OF MARK
PUNZALAN IN SUPPORT OF
MOTION OF THUAN NGUYEN FOR
CONSOLIDATION OF THE ACTIONS,
APPOINTMENT OF LEAD
PLAINTIFF, AND APPROVAL OF
LEAD COUNSEL**

Date: February 14, 2014
Time: 10:00 a.m.
Courtroom: 6, 17th Floor

27 JOHN MAGNISALIAS, Individually and on
28 Behalf of All Others Similarly Situated,
29
30 Plaintiff,

vs.

No. 3:13-cv-05438-CRB

Hon. Charles R. Breyer

1 TESLA MOTORS, INC., ELON MUSK, and
2 DEEPAK AHUJA,

3 Defendants.
4

5 I, Mark Punzalan, hereby declare as follows:

6 1. I am a member of the law firm of Punzalan Law, P.C., local counsel for Thuan
7 Nguyen (“Nguyen”), and a member in good standing for the bar of the State of California. I
8 respectfully submit this declaration in support of Nguyen’s Motion for Consolidation of the
9 Actions, Appointment as Lead Plaintiff, and Approval of Lead Counsel in the above-
10 captioned actions.

11 2. Attached hereto collectively as Exhibit A is a true and correct copy of the sworn
12 Certification of Nguyen.

13 3. Attached hereto as Exhibit B is a true and correct copy of the loss chart detailing
14 Nguyen’s losses as a result of his investments in Tesla Motors, Inc. common stock.

15 4. Attached hereto as Exhibit C is a true and correct copy of the press release originally
16 published on November 8, 2013, on *Globe Newswire* announcing the pendency of the first-
17 filed securities lawsuit.

18 5. Attached hereto as Exhibit D is a true and correct copy of the firm resume of Levi &
19 Korsinsky LLP.

20 I declare under penalty of perjury under the laws of the United States of America that
21 the foregoing facts are true and correct. Executed this 7th day of January 2014 at Redwood
22 City, California.

23
24 /s/ Mark Punzalan
25 Mark Punzalan
26
27